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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

BROADCAST MUSIC, INC.; SONY/ATV  
SONGS LLC; THE BERNARD EDWARDS  
COMPANY LLC; EMI VIRGIN SONGS,  
INC. d/b/a EMI LONGITUDE MUSIC;  
PWMP ACQUISITION I LLC d/b/a  
PRIMARY WAVE BRIAN; HOT-CHA  
MUSIC CO.; UNICHAPPELL MUSIC  
INC.; UNIVERSAL MUSIC MGB NA LLC  
d/b/a UNIVERSAL MUSIC CAREERS;  
BEECHWOOD MUSIC CORPORATION;  
E. O. SMITH MUSIC; EMI BLACKWOOD  
MUSIC, INC.; HIP CITY MUSIC INC.; and  
HIFROST PUBLISHING,

Plaintiffs,

v.

TRIPLE NICKEL PUB, LLC d/b/a TRIPLE  
NICKEL PUB; and FADI NABOULSI,  
individually,

Defendants.

Civil No.: 3:14-cv-01093

**MOTION FOR DEFAULT JUDGMENT**

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Pursuant to Federal Rule of Civil Procedure 55(b), and for the reasons stated in the Memorandum in Support of Motion for Default Judgment filed contemporaneously herewith, Plaintiffs respectfully move this Court for entry of default judgment ordering that:

(a) Defendants, their agents, servants, employees, and all persons acting under their permission and authority, be enjoined and restrained from infringing, in any manner, the copyrighted musical compositions licensed by BMI, pursuant to 17 U.S.C. § 502;

(b) Defendants pay statutory damages in the amount of \$12,000.00, which represents an award of \$1,500.00 for each of the eight (8) claims of infringement, pursuant to 17 U.S.C. § 504(c);

(c) Defendants pay Plaintiffs' costs, including reasonable attorney's fees in the amount of \$5,955.00, pursuant to 17 U.S.C. § 505;

(d) Defendants pay interest on these awards pursuant to 28 U.S.C. § 1961.

This motion is supported by the Declarations of Kerri Howland-Kruse, Brian Mullaney, and Nels Vulin, attached hereto as Exhibits 1, 2, and 3, respectively, which establish Plaintiffs' claims for relief. A proposed Order is attached for the Court's convenience as Exhibit 4.

DATED: November 5, 2014

BULLIVANT HOUSER BAILEY PC

By 

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